



U.S. Department of Justice

United States Attorney

Southern District of New York

United States District Court
300 Quarropas Street
White Plains, New York

June 11, 2021

BY ECF

The Honorable Philip M. Halpern
United States District Judge
Southern District of New York
The Hon. Charles L. Brieant Jr.
Federal Building and United States Courthouse
300 Quarropas Street
White Plains, New York 10601

Application granted. An Order will be docketed separately.

The Clerk of the Court is respectfully directed to terminate the motion sequence pending at Doc. 34.

SO ORDERED.

Philip M. Halpern
United States District Judge

Dated: White Plains, New York
June 11, 2021

Re: *United States v. Juan Soto Guzman, et al., Case No. 21 Cr. 114 (PMH)*

Dear Judge Halpern:

The Government respectfully submits this letter motion on consent and proposed order for an exclusion of time under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), in the above-referenced case. The prior status conference scheduled for June 7, 2021 was adjourned to July 21, 2021 at the request of the defendants with consent of the Government. The Government respectfully submits that an exclusion of time through to July 21, 2021 would serve the ends of justice and outweigh the best interest of the public and the defendants in a speedy trial because it would permit the parties to discuss a pre-trial disposition of the case, the defendants and their counsel to continue to review discovery, the Government to produce additional discovery requested, and the defendants to determine whether any motions are necessary in the event that the parties are not able to reach a resolution.

I have been advised by Daniel Hochheiser, counsel for defendant Juan Soto Guzman, and Benjamin Gold, counsel for defendant Melfrin Abreu Polanco, that the defendants consent to the foregoing request. The Government respectfully encloses a proposed order excluding time.

Respectfully submitted,

AUDREY STRAUSS
Acting United States Attorney

by: /s/ Kevin T. Sullivan

Kevin T. Sullivan
Assistant United States Attorney
914-993-1924

cc: Daniel Hochheiser, Esq. (via ECF)
Benjamin Gold, Esq. (via ECF)